

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
ROBERT WISE,	:	
	:	S1 23 Cr. 73 (MKV)
Defendant.	:	
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WHEREAS, on or about April 25, 2023, ROBERT WISE (the “Defendant”), was charged in a one-count Superseding Information S1 23 Cr. 73 (MKV) (the “Information”), with conspiracy to commit international money laundering, in violation of Title 18, United States Code, Section 371;

WHEREAS, the Information included a forfeiture allegation as to Count One of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Information;

WHEREAS, on or about April 25, 2023, the Defendant pled guilty to Count One of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Information and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) (C), a sum of money equal to \$3,771,727.67 in United States currency, representing property involved in the offense charged in Count One of the Information;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$3,771,727.67 in United States currency, representing property involved in the offense charged in Count One of the Information;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the property involved in the offense charged in Count One of the Information cannot be located upon the exercise of due diligence; and

WHEREAS, the Government agrees to accept \$210,441 in full satisfaction of the \$3,771,727.67 money judgment should Defendant pay \$210,441 in United States currency to the Government by December 31, 2023.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys Jessica Greenwood, Joshua Naftalis, and Sheb Swett, of counsel, and the Defendant, and his counsel, Jillian Berman, Esq., that:

1. As a result of the offense charged in Count One of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$3,771,727.67 in United States currency (the "Money Judgment"), representing the amount of property involved in the offense charged in Count One of the Information, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, ROBERT WISE, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to United States Customs

and Border Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. Upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to Title 21, United States Code, Section 853, United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. In the event the Defendant makes a payment in the amount of \$210,441 in United States currency (the "Payment") pursuant to Paragraph 3, *supra*, by December 31, 2023, the Government will accept the Payment in full satisfaction of the Money Judgment. If Defendant does not make the Payment by December 31, 2023, Defendant will remain liable for the full amount of the Money Judgment.

6. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

7. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.


8. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

9. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York


By:

  
\_\_\_\_\_  
Jessica Greenwood / Joshua Naftalis /  
Sheb Swett  
Assistant United States Attorneys  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-1090/2310/6522

4/25/23  
DATE

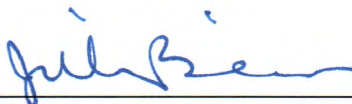
ROBERT WISE

By:

  
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ROBERT WISE

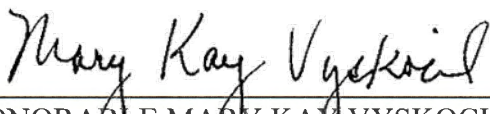
4/25/23  
DATE

By:

  
\_\_\_\_\_  
Jillian Berman, Esq.  
Attorney for Defendant  
1185 Avenue of the Americas  
New York, New York 10036

4/25/23  
DATE

SO ORDERED:

  
\_\_\_\_\_  
HONORABLE MARY KAY VYSKOCIL  
UNITED STATES DISTRICT JUDGE

4/25/23  
DATE